

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHRISTMAS TREE SHOPS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 23-10576 (TMH)

(Jointly Administered)

GEORGE L. MILLER, in his capacity as Chapter
7 Trustee of CHRISTMAS TREE SHOPS, LLC
et al.,

Plaintiff,

vs.

BESTWAY (USA), INC., d/b/a BESTWAY
INFLATABLES,

Defendant.

Adv. Proc. No. 25-50862 (TMH)

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Christmas Tree Shops, LLC, *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant Bestway (USA), Inc., alleged by the Plaintiff to be doing business as Bestway Inflatables (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for Defendant to Answer or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree

¹ The Debtors in these chapter 7 cases and the last four digits of each Debtor’s U.S. tax identification number are as follows: Christmas Tree Shops, LLC (1207), Handil, LLC (1150), Handil Holdings, LLC (2891), Salkovitz Family Trust 2, LLC (8773), and Nantucket Distributing Co., LLC (1640).

as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer or otherwise respond to the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including July 14, 2025.

2. Except as specifically set forth herein, the Parties reserve all of their respective rights in this matter.

Dated: June 12, 2025

Dated: June 12, 2025

PACHULSKI STANG ZIEHL & JONES LLP

WOMBLE BOND DICKINSON

/s/ Peter J. Keane

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Peter J. Keane (DE Bar No. 5503)
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/s/ Matthew Ward

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*Counsel to Defendant
Bestway (USA), Inc.*

*Counsel to Plaintiff George L. Miller, Chapter 7
Trustee of Christmas Tree Shops, LLC, et al.*

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CERTIFICATE OF SERVICE

I, Peter J. Keane, hereby certify that on the 12th day of June, 2025, I caused a copy of the following document(s) to be served on the individual(s) on the attached service list(s) in the manner indicated:

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

/s/ Peter J. Keane

Peter J. Keane (DE Bar No. 5503)

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CHRISTMAS TREE SHOPS, LLC –
Service List
re BESTWAY (USA), INC., d/b/a BESTWAY
INFLATABLES
Adv. Pro. No. 25-50862 (TMH)

(Counsel to Defendant Bestway (USA), Inc.)
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